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July 1, 2022

Via ECF

Hon. Jesse Furman, U.S.D.J. (S.D.N.Y.)

Re: *Donoghue, et. al. v. Smith, et. al.*, No. 21-CV-4811 (JMF)

Joint Request for 30-Day Extension of Discovery Period

Your Honor:

I am one of Plaintiffs' attorneys, and I write, with the Defendant's consent, to request a 30-day extension of the discovery deadline. The parties previously agreed to a two-month discovery period ending on August 15, 2022, with the understanding that the deposition of Defendant David Smith would be completed in advance of that deadline.

Plaintiffs have advised that they also intend to depose the two individual Trustees of the trusts involved in the transactions in this case (Steven Thomas and Paul Wallace). The parties jointly request a 30-day extension of the discovery period to schedule the additional depositions.

The new discovery deadline proposed by the parties is: September 14, 2022. A revised Case Management Plan is attached. The requested extension will not affect any other deadlines. This is the first request for a discovery extension in this case.

The parties also propose an adjournment of the status conference currently scheduled for August 29, 2022. The parties request that the conference be held during the week of September 10, 2022, due to a conflict in Defendants' counsel's schedule during the first week of September.

Respectfully submitted,

s/ *Miriam Tauber*

Miriam Tauber, *Attorney for Plaintiffs*

Application GRANTED. Further extensions of this deadline are unlikely to be granted. The pretrial conference scheduled for August 29, 2022, is rescheduled to **September 20, 2022, at 4:00 p.m.** The Clerk of Court is directed to terminate ECF No. 41. SO ORDERED.



July 5, 2022